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ROCKY FLATS PLANT COMMUNITY RELATIONS PLAN

Environmental Restoration Program

U.S. Department of Energy
Rocky Flats Plant
Golden, Colorado

November 1990

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ROCKY FLATS PLANT COMMUNITY RELATIONS PLAN

Rocky Flats Plant, Golden, Colorado

A. Overview

The *Rocky Flats Plant Community Relations Plan* describes the mechanisms through which the Rocky Flats Plant will inform and involve the public in environmental restoration and related environmental activities at the facility. Development of the plan is driven by the community relations provisions of two federal laws concerning hazardous materials management and cleanup, the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Activities under the plan are also intended to meet requirements of the National Environmental Policy Act. The plan is modeled after the draft U.S. Environmental Protection Agency guidance document, *Community Relations in Superfund: A Handbook*, June 1988, OSWER 9230.0-3B.

RCRA regulates hazardous waste generation, transportation, treatment, storage and disposal. CERCLA regulates the cleanup of sites contaminated with hazardous substances and establishes a National Priority List that identifies sites requiring investigation and remedial action. Additional community relations requirements and a schedule for the plan's development and implementation are provided by the Federal Facility Agreement and Consent Order, an interagency agreement (IAG) among the U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health.

While some sites identified for cleanup at the Rocky Flats Plant fall under the jurisdiction of either RCRA or CERCLA, others will be subject to both requirements. RCRA regulations apply to currently operating hazardous waste treatment, storage and disposal facilities, and the RCRA corrective action provisions are implemented to remediate releases of hazardous materials from these facilities. CERCLA regulations apply when hazardous materials have been released from abandoned or uncontrolled hazardous waste sites that are not considered treatment, storage and disposal facilities.

Environmental restoration under the two statutes involves several stages of investigation, assessment and action. The first stage is a preliminary characterization to identify potentially hazardous sites that need further investigation. RCRA refers to this activity as the RCRA Facility Assessment. The similar CERCLA effort is a Preliminary Assessment/Site Inspection.

The second stage fully characterizes the nature, extent and rate of contaminant releases identified in the initial characterization. The RCRA term for the full characterization is RCRA Facility Investigation, while the companion CERCLA process is Remedial Investigation.

The third stage of environmental restoration is the evaluation and selection of remediation alternatives. RCRA requires a Corrective Measures Study, which may develop only one alternative. The similar CERCLA activity is a Feasibility Study, which must consider several remedial action alternatives.

The fourth stage authorizes and supports the selection of a remedy. The RCRA Notice of Decision and the CERCLA Record of Decision comprise information used in determining the final remedy.

The final stage involves the design and implementation of the selected remedy. RCRA refers to this activity as the Corrective Measures Implementation. The similar CERCLA effort is Remedial Design/Remedial Action.

An additional stage not included in the statutes will be implemented at the Rocky Flats Plant. An Interim Measures/Interim Remedial Action stage will evaluate alternatives and select actions to serve as interim measures in the remediation of certain areas of the Plant.

While RCRA, CERCLA and the IAG provide the basis for the ***Rocky Flats Plant Community Relations Plan***, the plan is tailored to the needs of the community. Members of the public in the Denver metropolitan area contributed substantially to the development of the plan through an extensive community interview program.

Interviews with government officials, area businesses, educational representatives, health professionals, interest groups, news media and local residents identified public concerns and expectations regarding cleanup of the plant. In addition, the interview participants suggested community relations activities that would help the public become better informed about environmental cleanup at the plant and ensure early citizen involvement in the decision making process.

Public participation was also sought in defining the community in which the Rocky Flats Plant will concentrate its community relations activities. The consensus among interview participants was that the community should be defined as metropolitan Denver; Boulder and Boulder County; and Golden and Jefferson County. Therefore, the focus of this plan is on these areas.

The ***Rocky Flats Plant Community Relations Plan*** establishes the Rocky Flats Plant's community relations objectives regarding environmental restoration, monitoring and waste management at the Rocky Flats Plant and describes the planned mechanisms for meeting those objectives. Community relations initiatives concerning other Plant issues will be modeled after those developed in this plan.

The ***Rocky Flats Plant Community Relations Plan*** is organized as follows:

- Site Description
- Community Background
- Objectives
- Community Relations Activities

The first three sections provide the framework for the discussion of community relations activities, which are divided into two parts. The first part addresses the community relations activities required by federal law and established in the IAG. The second part sets forth additional community information and involvement initiatives that will be implemented in response to public comments on the IAG and as suggested during community interviews.

More information about the ***Rocky Flats Plant Community Relations Plan*** and the topics it addresses can be obtained from the Community Relations Plan Information Coordinator:

Community Relations Plan Information Coordinator
Community Relations Division
EG&G Rocky Flats, Inc.
P.O. Box 464, T130F
Golden, Colorado 80402-0464
(303) 966-6160

Additional information contacts for the Rocky Flats Plant, the U.S. Environmental Protection Agency, the Colorado Department of Health, Congressional offices, state and local governments, environmental and citizen groups, medical and public health interests, businesses, educational interests, news media, and local citizens are listed in Appendix A.

B. Site Description

The Rocky Flats Plant is located in northern Jefferson County, Colorado, approximately 16 miles northwest of downtown Denver and nine to 12 miles from the communities of Boulder, Broomfield, Westminster, Arvada and Golden (Figure 1). The 384-acre plantsite is located within a restricted preserve of 6489 acres, which serves as a buffer zone between the Plant and the surrounding communities. Current employment at the Plant is approximately 6200.

The Plant, located on the eastern edge of a geological bench known locally as Rocky Flats, is at an elevation of about 6000 feet. The rocky bench is about five miles wide in an east-west direction and flanks the eastern edge of the Front Range of the Rocky Mountains. The Continental Divide is approximately 26 miles west of the Plant.

The Rocky Flats Plant is directly upstream of two reservoirs used for municipal water supply, Great Western Reservoir and Standley Lake. Walnut Creek and Woman Creek are the two intermittent creeks that naturally drain the area from the plantsite into Great Western Reservoir and Standley Lake, respectively. Walnut Creek drainage, however, is diverted around Great Western Reservoir and discharged back into the creek east of the reservoir. Additionally, Woman Creek drainage is intercepted by a dam on the plantsite and directed by pipeline into Walnut Creek upstream of the diversion around Great Western Reservoir.

Construction of the Rocky Flats Plant began in 1951, and initial operations occurred the following year. The Plant was operated at that time by Dow Chemical U.S.A., a unit of the Dow

Chemical Company, for the U.S. Atomic Energy Commission (AEC). When the Energy Reorganization Act of 1974 dissolved the AEC, federal government responsibility for the Plant was assigned to the Energy Research and Development Administration (ERDA). On July 1, 1975, Rockwell International assumed operation of the Plant for ERDA. Two years later, ERDA was changed to the U.S. Department of Energy, the current federal agency responsible for the Plant. EG&G Rocky Flats, Inc. took over the operating contract on January 1, 1990.

The Plant is a key facility in the federal government's nationwide nuclear weapons research, development and production complex. It supports the nuclear weapons program and other work related to national defense with unique processing capabilities for the fabrication of weapons components from plutonium, uranium, beryllium and stainless steel. The Plant also plays a key role in the decommissioning and maintenance of nuclear weapons and will be instrumental in the implementation of future arms reduction treaties.

The plutonium operations involve the use of high-precision equipment and techniques for metallurgical casting, rolling and forming operations; machining, joining and nondestructive testing; and chemical operations necessary for recovery of plutonium for reuse.

Beginning with Plant operations in 1952, materials that would later be defined as hazardous substances, pollutants and contaminants by CERCLA and materials that would be defined as hazardous waste and hazardous constituents by RCRA have been used, produced and managed at the Plant. Some of these materials have been detected in air, water and soil at the site.

In April 1986, the U.S. Department of Energy completed the ***Comprehensive Environmental Assessment and Response Program, Phase I: Installation Assessment***, which investigated 80 potential environmental problems and identified areas that qualified for inclusion on the National Priority List (NPL) established by CERCLA.

In July 1986, the U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health entered into a Compliance Agreement that defined roles and established milestones for environmental operations and remedial investigations at the Rocky Flats Plant. Pursuant to the 1986 Compliance Agreement, the U.S. Department of Energy

(MAP BEING GENERATED)

Figure 1. Map of Denver Area

identified 178 individual hazardous substance sites, which are discrete land areas where hazardous substances are or may be present. The Rocky Flats Plant was placed on the NPL in September 1989.

The Federal Facility Agreement and Consent Order, referred to as the Interagency Agreement (IAG), replaces the 1986 Compliance Agreement. An attachment to the IAG lists hazardous substances used at the Plant that have been released or that could be released to the environment.

The identified substances include radionuclides, metals, inorganics, volatile organics, semi-volatile organics and miscellaneous materials. The containment of these substances is of concern to the Plant, federal and state regulators and the public because of their potential carcinogenic, mutagenic or teratogenic effects to humans and other life forms. The IAG list is included in this document as Appendix B.

The IAG, setting forth the activities and schedules for environmental restoration at the Plant, organizes the individual hazardous substance sites in 16 larger areas, termed operable units (OUs). The OUs are ranked and assigned schedules according to cleanup priority. The schedule provides for interim remedial action at several of the OUs while investigations continue in support of final remedial action. The 16 operable units are designated as follows:

- OU 1 881 Hillside Areas
- OU 2 903 Pad, Mound and East Trenches Areas
- OU 3 Off-Site Releases
- OU 4 Solar Ponds
- OU 5 Woman Creek
- OU 6 Walnut Creek
- OU 7 Present Landfill
- OU 8 700 Area
- OU 9 Original Process Waste Lines
- OU 10 Other Outside Closures
- OU 11 West Spray Field
- OU 12 400/800 Area
- OU 13 100 Area
- OU 14 Radioactive Sites
- OU 15 Inside Building Closures
- OU 16 Low-Priority Sites

The IAG provides milestones for the activities and documentation required for CERCLA and RCRA remediation of the 16 operable units. The milestone schedules extend into August 2001.

C. Community Background

Community Profile

Located 16 miles from downtown Denver, Colorado, the Rocky Flats Plant is on the fringe of a highly populated metropolitan area. The 1990 estimated population within a 50-mile radius of the plant is approximately 1.9 million. The communities closest to the Plant, Broomfield, Westminster and Arvada, have grown substantially since the Plant was built in 1951, greatly increasing the population within a 10 to 20 radius of the Plant.

With a median age of 30, the Denver metropolitan area has the second highest number of college graduates in the country. As a whole, the citizens in the area have a high level of general knowledge about the Rocky Flats Plant, its mission and the associated environmental issues. During the community interview process, most participants cited the media as their primary source of information about the Plant in the past. Nearly all participants expressed interest in improved public access to information and involvement with the Plant and its regulators in the environmental restoration process.

Chronology of Community Involvement

Because of the proximity of the Rocky Flats Plant to a major metropolitan area, public interest over the years has focused on operations and activities that could affect public health and the environment. Public tours of the Plant were initiated in 1975 to increase community awareness about Plant operations and safety procedures. Late in the 1970s, the Plant was the site of major rallies, both to protest the production of nuclear weapons and to promote the development of nuclear power. Thousands of people participated in the demonstrations.

Interest fell off significantly until 1985 when the Rocky Flats Plant reported the discovery of volatile organic compounds in some of the on-site groundwater monitoring wells. At that time, the Plant submitted an application to the U.S. Environmental Protection Agency and the Colorado Department of Health for a RCRA operating permit in compliance with federal and state hazardous waste legislation.

The U.S. Department of Energy further identified the nature and extent of on-site contamination in a 1986 report, ***Comprehensive Environmental Assessment and Response Program, Phase I: Installation Assessment***. Following submittal of the RCRA permit application, the U.S. Department of Energy entered into discussions with the U.S. Environmental Protection Agency and the Colorado Department of Health that resulted in the 1986 Compliance Agreement.

The testing in 1987 of an incinerator for reducing the volume of liquid and solid low-level mixed and hazardous waste was received with much public controversy. Again, the public's concern was the potential for environmental contamination as a result of Plant activities, specifically incineration.

In June 1989, a Federal Bureau of Investigation raid to look into allegations of mismanagement and negligent practices generated nationwide attention. In August 1989, a federal grand jury was convened to determine if any laws had been violated. No indictments have been issued as a result of the investigation to date. However, the investigation precipitated more questions and concerns in the community about the Plant and its operations.

The Rocky Flats Plant is responding to the public's high-level of interest with several information and involvement initiatives. Through an established tour program, community groups and the media visit the Plant on a regular basis. In addition, an active Speakers Bureau offers presentations by Plant personnel to groups in the area upon request. Frequent contact with federal, state and local officials, businesses, the news media, interest groups and the general public inform the community of Plant activities. Opportunities for public review and comment on specific actions provide the Rocky Flats Plant with valuable input and recommendations.

Key Community Concerns

The *Rocky Flats Plant Community Relations Plan* is based largely on concerns expressed and requests and recommendations offered by members of the public through the community interview process. Interview participants were asked to identify their main concerns about the Rocky Flats Plant and their expectations regarding its cleanup. Participants were also asked to identify ways that the Plant could more effectively inform them of environmental restoration activities and involve them in the decision making process. Responses to community interview questions are tabulated in Appendix C. The key community concerns identified through the interviews were:

- **Hazardous and Radioactive Materials Contamination.** The concern most often expressed by interview participants was the potential effect of past or future releases of hazardous and radioactive materials into the air, water and/or soil in the vicinity of the Plant.
- **Fires, Accidents and Safety Issues.** The second most often expressed concern related to the potential public health and environmental effects of a major event that would cause the release of radioactive and/or hazardous materials into the environment. Fires, accidents and natural disasters were offered as examples.
- **Health of Area Residents.** The third most often expressed concern by interview participants was that the health of nearby residents might be jeopardized as a result of the Plant.
- **Adequacy or Credibility of Information from the Plant.** The fourth most often expressed concern was that information from the Rocky Flats Plant historically has been inadequate and/or not credible.

- **Health of Plant Workers.** The fifth most often expressed concern was that Plant workers might suffer health effects from their work with or near radioactive and hazardous materials.

D. Objectives

The public information and involvement activities outlined in the ***Rocky Flats Plant Community Relations Plan*** are intended to accomplish several objectives:

- **Enhance public knowledge.** While the community interview process demonstrated that citizens in the area generally understand the mission of the Rocky Flats Plant, a lack of nontechnical information about Plant activities has raised public concern about public and worker safety and environmental contamination and other topics. Community relations efforts as described in the plan are designed to improve the availability of information about the Plant's current and planned environmental restoration and related activities.
- **Encourage public involvement.** Increased availability of nontechnical information, coupled with frequent opportunities for public input, will provide for meaningful public involvement in environmental efforts at the Plant. The plan offers mechanisms for formal and informal community interaction with federal and state regulators and Plant personnel.
- **Provide a forum for conflict resolution.** Cooperative efforts to address environmental remediation issues at the Rocky Flats Plant will provide a framework for the resolution of conflicts that result from differences in opinion and technical approach. By bringing the community into the cleanup process in the early stages of decision making, all groups involved will better understand the challenges and options that must be factored into a viable solution.
- **Meet RCRA, CERCLA and IAG requirements.** The plan meets all community relations requirements of RCRA, CERCLA and the IAG. In addition, the plan incorporates suggested activities that the U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health agreed to include in the plan in their response to public comment on the IAG. Lastly, the plan addresses concerns and recommendations expressed during the community interview process.

E. Community Relations Activities

The community relations activities outlined in this section are based on requirements set forth in CERCLA, RCRA and the IAG. Additional activities reflect suggestions offered by the public

during the community interview process. These activities are designed to bring the community into the environmental restoration process through meaningful exchange of information and ideas.

Required Activities

The Rocky Flats Plant will implement the required community relations activities as follows:

- **Information Repositories.** Information repositories are established to ensure public access to environmental restoration documentation. Four information repositories currently are maintained at:
 - the U.S. Department of Energy Public Reading Room at Front Range Community College Library, Westminster;
 - the U.S. Environmental Protection Agency, Region VIII Superfund Records Center, Denver;
 - the Colorado Department of Health, Denver; and
 - the Rocky Flats Environmental Monitoring Council, Golden.

Addresses, telephone numbers and hours of operation are provided in Appendix D.

The IAG identifies the types of primary and secondary documents that must be sent to the information repositories upon their release. Additional materials may be made available to the public upon request. The IAG list is as follows:

- RCRA Facility Investigation/CERCLA Remedial Investigation Workplans (Draft and Final);
- RCRA Facility Investigation/CERCLA Remedial Investigation Reports (Draft, All Phases and Final);
- RCRA Corrective Measures Study/CERCLA Feasibility Study Reports (Draft, All Phases and Final);
- CERCLA Proposed Remedial Action Plan (Draft and Final);
- Interim Measures/Interim Remedial Action Plans and Decision Documents (Draft, Proposed and Final);
- Responsiveness Summaries;
- RCRA Corrective Action Decisions/CERCLA Records of Decisions (Draft and Final);
- RCRA Corrective/CERCLA Remedial Design Plans;
- RCRA Corrective Design/CERCLA Remedial Design Workplans;
- Community Relations Plans;
- Sampling and Analysis Plans;
- Plan for Prevention of Contaminant Dispersion;
- Background Study Plan;
- Treatability Study Plan;
- Workplan to Implement Discharge Limits for Radionuclides;
- Interim Measures/Interim Remedial Action Implementation Document; and
- Certification of Completion;
- Historical Release Report;
- Monthly Progress Reports;

- Health and Safety Plan;
- Baseline Risk Assessment Technical Memoranda;
- RCRA Corrective Measures Study/CERCLA Feasibility Study Technical Memoranda;
- RCRA Facility Investigation/CERCLA Remedial Investigation Workplan Technical Memoranda; and
- Priority Proposal for Operable Units No. 3,5,6,8,12,13,14,15 and 16.

The U.S. Department of Energy will explore options for enhancing public access to information at the repositories. Based on suggestions offered during the community interview process, the Rocky Flats Plant will investigate the public interest in and logistical aspects of establishing an additional repository near the plant. Also, the feasibility of implementing a computerized system for remote access to information in the repositories is under investigation, as requested by several interview participants.

- **Administrative Record.** Copies of the administrative record, which is the information that supports the selection of a response action, will be available to the public for review throughout the environmental restoration process.

Copies of the administrative record will be available on microfiche at the four information repositories listed above and in Appendix D. One copy will be available for public review after normal business hours at the U.S. Department of Energy's Public Reading Room at the Front Range Community College Library.

- **Mailing List.** The Rocky Flats Plant will maintain a mailing list of individuals and organizations interested in receiving information about the plant and will share the list with the U.S. Environmental Protection Agency and the Colorado Department of Health. The list will be used for the dissemination of items such as news releases, fact sheets and environmental restoration updates. Mailing list additions, changes and deletions will be made upon request to the Community Relations Plan Information Coordinator.
- **News Releases.** The Rocky Flats Plant will periodically issue news releases about environmental restoration activities to the media and interested citizen groups. The Rocky Flats Plant will maintain a list of interested groups to whom the releases will be sent via facsimile transceiver in conjunction with dissemination to the media. For any organizations that do not have the technology to receive facsimiles, the news releases will be sent through regular mail. Interested groups can be included on the news releases list by contacting the Community Relations Plan Information Coordinator.
- **Public Meetings.** The Rocky Flats Plant, along with the U.S. Environmental Protection Agency and the Colorado Department of Health, will hold public information meetings at least quarterly. The public information meetings will inform the public of the status of significant current and planned permitting and cleanup activities performed under RCRA and CERCLA.

In addition to the regular public information meetings, other meetings concerning environmental restoration progress and compliance with the IAG will be scheduled as needed and as determined by the U.S. Department of Energy, the U.S. Environmental Protection Agency or the Colorado Department of Health.

At least one public meeting will be held during the public comment period for each draft interim or final Proposed Remedial Action Plan and concomitant draft RCRA permit or RCRA permit modification. Meetings on proposed plans will be held by the U.S. Department of Energy. Meetings on draft RCRA permits will be held by the Colorado Department of Health.

For Class 2 or Class 3 modifications to a RCRA corrective action permit, the party requesting the modification, either the U.S. Department of Energy or the Colorado Department of Health, will hold a public comment period and meeting.

A display advertisement announcing each public meeting held by the U.S. Department of Energy will be placed in area publications of general circulation. Also, a direct mail notice will be sent to each person and organization on the Rocky Flats Plant mailing list. Finally, a public information announcement about the meeting will be sent to major radio stations in the areas with significant interest.

The Rocky Flats Plant will determine the locations of public meetings in conjunction with the U.S. Environmental Protection Agency and the Colorado Department of Health. Based on citizen recommendations made during the community interview process, most public meetings will be held on weekday (Monday through Thursday) evenings in the communities near the Rocky Flats Plant, provided adequate facilities are available. Public meetings may be held periodically in or near the cities of Denver, Boulder, Golden, Thornton and Northglenn to consider issues of general interest or of particular interest to those cities.

Each public meeting will be transcribed by a court reporter. Transcripts will be placed in the information repositories for public review and will be made a part of the administrative record. Additional copies of transcripts will be available to interested individuals upon written request to the Community Relations Plan Information Coordinator.

In developing formats for public meetings, the Rocky Flats Plant will continually look for ways to improve information dissemination and interaction with the public while meeting the legal and procedural requirements of RCRA, CERCLA and the IAG.

- **Public Comment Opportunities.** In accordance with CERCLA, RCRA and/or the IAG, the following documents will be made available for public comment:

- Community Relations Plan;
- Draft Colorado Hazardous Waste Act/RCRA Permits for Treatment, Storage and Disposal Units;
- Draft Hazardous and Solid Waste Amendment Act Permits for Corrective Action at Solid Waste Management Units;
- Colorado Hazardous Waste Act/RCRA Permits with Proposed Class 2 or Class 3 Modifications;

- RCRA Closure Plans;
- Interim Measures and Interim Remedial Action Plans;
- CERCLA Final Proposed Remedial Action Plans;
- Plan for the Prevention of Contaminant Dispersion; and
- Workplan Designed to Implement Discharge Limits for Radionuclides.

The Colorado Department of Health will conduct the public comment periods for RCRA Closure Plans and RCRA permits. Public comment periods for IAG documents are delineated in Appendix E.

A display advertisement announcing the availability of the remaining documents for comment will be placed by the Rocky Flats Plant in publications of general circulation. The display advertisement will include a brief description of the document.

Also, a direct mail notice will be sent to each person and organization on the Rocky Flats Plant Mailing list. Finally, a public information announcement about document availability will be sent to major radio stations in the areas of significant interest. When possible, the announcement of a document's availability will be combined with the announcement of the public comment meeting for that document.

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP), which codifies the provisions of CERCLA, requires a 30-day comment period for proposed remediation plans and provides for an extension of at least 30 days. In addition, the IAG requires a public comment period of at least 60 days for proposed interim measures/interim remedial action plans. Hence, the Rocky Flats Plant will provide a comment period of 60 days for each of the documents listed. At least one public meeting will be held during each public comment period for citizens to offer oral comments.

- **Responsiveness Summaries.** A responsiveness summary, in which a response is provided for each comment from the public, will be prepared following each public comment opportunity. The responsiveness summaries for RCRA corrective actions and CERCLA remedial actions will be placed in the information repositories. This will occur at least 10 days prior to commencement of the respective actions and at least at the same time as issuance of the final decision document for each. All responsiveness summaries will become part of the administrative record and placed in the information repositories.
- **Public Hearing Opportunities.** The Colorado Department of Health is responsible for holding public hearings on draft RCRA permits. The Rocky Flats Plant will assist the Colorado Department of Health with public hearings upon request. Copies of hearing transcripts will be provided to members of the public upon written request to the Community Relations Plan Information Coordinator.
- **RCRA Corrective Action Decision/CERCLA Record of Decision.** The information supporting the selection of a remedial action will be documented in a corrective action decision/record of decision and included in the administrative record. Upon the approval of

the U.S. Environmental Protection Agency and the Colorado Department of Health, the corrective action decision/record of decision will be signed by the U.S. Department of Energy.

Before the remedial action is initiated, the Rocky Flats Plant will place a notice of availability of the document in publications of general circulation. The notice will include the basis and purpose of the selected action. Each corrective action decision/record of decision will be available for public review at the information repositories prior to the commencement of its respective remedial action.

If the selected remedial action differs significantly from the proposed action, the Rocky Flats Plant will include a discussion of the change in the corrective action decision/record of decision if it determines that the change is consistent with the alternatives and the information considered. If the Rocky Flats Plant concludes that the change in remedy could not have been anticipated based on available information, a revised proposed plan will be issued for additional public comment.

If the actual remedial action implemented differs significantly from the action supported in the corrective action decision/record of decision, the Rocky Flats Plant will either print an explanation of the significant differences in publications of general circulation or, if necessary, propose an amendment to the corrective action decision/record of decision. In the latter case, the Rocky Flats Plant will place a notice of availability and a brief description of the proposed amendment in publications of general circulation.

The proposed amendment to the corrective action decision/record of decision and the information supporting the decision will be made available for public comment. The requirements for notification, location, recordkeeping and response will be consistent with those described previously.

The Rocky Flats Plant will place a notice of availability of an amended corrective action decision/record of decision in publications of general circulation. Prior to initiation of the remedial action affected by the amendment, the amended corrective action decision/record of decision and the supporting information will be made available for public review at the information repositories and will be included in the administrative record.

- **Dispute Resolution.** The IAG sets forth a process for the resolution of disputes between the U.S. Department of Energy, the U.S. Environmental Protection Agency and/or the Colorado Department of Health. Disputes not resolved by the agencies' project coordinators will be forwarded to the Dispute Resolution Committee, comprising one representative from each of the agencies. If the Dispute Resolution Committee cannot unanimously resolve the dispute, it is taken to the Senior Executive Committee, on which senior managers from each of the three agencies serve.

When disputes involving the U.S. Department of Energy are elevated to the Senior Executive Committee level, the Rocky Flats Plant will issue a public notice that describes the issue of dispute. The notice will be published in area newspapers and mailed to individuals and organizations on the Rocky Flats Plant mailing list.

- **Technical Assistance Grants.** The Technical Assistance Grant program, provided for in CERCLA, is a mechanism for citizen groups to obtain expert assistance in reviewing technical information on environmental restoration. The U.S. Environmental Protection Agency administers the grants.

Through the grant program, citizen groups are reimbursed by the federal government for their efforts in the document review process, which allows for greater public participation than might be possible otherwise. Citizen groups interested in obtaining more information about the Technical Assistance Grant Program should contact the U.S. Environmental Protection Agency's Region VIII Office as follows:

John Ogden
8HWM-SM
Technical Assistance Grant Program
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500
Denver, Colorado 80202-2405
(303)293-1870

The U.S. Department of Energy welcomes the involvement of Technical Assistance Grant recipients and will cooperate with requests for unclassified environmental restoration information and documents to the extent practicable.

- **Response to Community Information Requests.** Requests for environmental restoration information from all interested individuals and organizations will be responded to fairly and equitably. The public can request information in writing or by telephone by contacting the Community Relations Plan Information Coordinator:

Community Relations Plan Information Coordinator
Community Relations Division
EG&G Rocky Flats, Inc.
P.O. Box 464, T130F
Golden, Colorado 80401-0464
(303)966-6160

Requests for information will be responded to in writing as soon as practicable and no later than 30 days from the date of the request. If requested information is not available, the response will supply the status of that information, including, if possible, an expected date of availability.

- **Fact Sheets.** The Rocky Flats Plant will issue fact sheets on RCRA or CERCLA proposed remedial action plans, including those developed as interim measures. The fact sheets will be provided to the public before commencement of the remedial action.
- **Revision of the Community Relations Plan.** Prior to commencement of a RCRA corrective measures implementation or CERCLA remedial design/remedial action, the

Rocky Flats Plant Community Relations Plan will be revised, if necessary, to address any new community concerns expressed regarding remedial design and construction. Also, the **Rocky Flats Plant Community Relations Plan** will be revised if necessary to meet future needs of the community or if new or amended existing regulations require additional community relations activities.

- **Amendment of the IAG.** The U.S. Department of Energy, the U.S. Environmental Protection Agency and the Colorado Department of Health will develop and agree to any major modifications to the IAG. Modifications that pertain to cleanup sites addressed by the RCRA corrective action permit will be offered for public comment. If modifications result in changes to the IAG schedule, the Rocky Flats Plant will issue a notice for placement in area publications and dissemination to individuals and organizations on the Rocky Flats Plant mailing list.

Additional Activities

The following community relations activities, which are not required by law or agreement, will be implemented by the Rocky Flats Plant:

- **Briefings and Presentations.** The Rocky Flats Plant will offer briefings and presentations on environmental restoration and related plans and activities to federal, state and local officials; local government technical staffs; business organizations; news media; schools; interest groups; and individuals as requested to the extent practicable.
- **Technical Review Committee.** The Rocky Flats Plant will actively solicit public input in the early stages of planning for cleanup through the formation of a technical review committee. Participation will include the U.S. Environmental Protection Agency, the Colorado Department of Health, area local governments and interest groups.
- **Public Tours.** Tours of areas of the Rocky Flats Plant will be offered to groups and organizations at their request. If there is sufficient interest, tours for the general public and family members of employees will be conducted the second Monday of each month. All plant tours will comply with U.S. Department of Energy and EG&G Rocky Flats, Inc. tour policies. Plant tours for media representatives will be held independent of public tours.
- **Fact Sheets and Citizen Guides.** Fact sheets and citizen guides, in addition to those required by federal statute as described above, will be developed to inform the public of major environmental restoration activities and other related issues. The fact sheets, which will address topics such as waste management, environmental cleanup and environmental monitoring, will be disseminated through the Rocky Flats Plant mailing list and made available at public meetings.
- **Environmental Restoration Updates.** The Rocky Flats Plant will publish a bimonthly update describing progress in environmental restoration efforts. Concise summaries of other major environmental activities will be included also. The update will be distributed to individuals and organizations on the Rocky Flats Plant mailing list.

- **Speakers Bureau.** A Speakers Bureau will provide presentations by Plant experts to community groups, businesses and others upon request. Speakers will offer a variety of topics, including environmental management, waste minimization, environmental monitoring and protection, remediation and environmental regulation.
- **Employee Communications.** The community relations efforts developed to inform and involve the public will be offered to Rocky Flats Plant employees as they are equally interested in the Plant's environmental restoration program.

The community relations activities described will be implemented throughout the duration of the cleanup effort. Other activities may be added during that time based on requirements, need and available resources.

APPENDIX A

LIST OF CONTACTS AND INTERESTED PARTIES

The following list identifies community relations and technical personnel from the Rocky Flats Plant, the U.S. Department of Energy headquarters, the U.S. Environmental Protection Agency and the Colorado Department of Health who can be contacted with questions about environmental activities at the Plant. The list also includes community interview participants who agreed to serve as contacts for citizens who may want to learn about various community perspectives on the Rocky Flats Plant.

Rocky Flats Plant

Community Relations

Beth Brainard (303) 966-5993
Public Affairs Officer
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Terry Smith (303) 966-2986
Manager, Community Relations
EG&G Rocky Flats, Inc.
P.O. Box 464
Golden, Colorado 80402-0464

Jill Paukert (303) 966-6160
Community Relations Plan Information
Coordinator
EG&G Rocky Flats, Inc.
P.O. Box 464
Golden, Colorado 80402-0464

Technical

Frazer Lockhart (303) 966-7846
Director, Environmental Restoration
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Erich Evered (303) 966-4934
Director, Environmental Restoration
EG&G Rocky Flats, Inc.
Golden, Colorado 80402-0464

U.S. Department of Energy, Headquarters

Raymond I. Greenberg (303) 353-5438
Chief, Decontamination and Decommissioning Branch
Division of Southwestern Area Programs (EM-45)
U.S. Department of Energy
Washington, DC 20545

U.S. Environmental Protection Agency, Region VIII

Community Relations

Sonya Pennock (303) 294-1115
Community Relations Coordinator
U.S. Environmental Protection Agency
Region VIII
999 18th Street
Denver, Colorado 80202

Technical

Martin Hestmark (303) 294-1132
Rocky Flats Team Leader
Federal Facilities Remedial Branch
Hazardous Waste Management Division
U.S. Environmental Protection Agency
Region VIII
999 18th Street
Denver, Colorado 80202

Colorado Department of Health

Community Relations

Ann Lockhart (303) 331-6733
Manager of Community Relations
Rocky Flats Program Unit
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Technical

Joe Palomba (303) 331-6740
Interim Program Manager
Rocky Flats Program Unit
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Federal Elected Officials and Staffs

Jim Martin (303) 866-1900
Colorado Director
Office of Senator Tim Wirth
1129 Pennsylvania
Denver, Colorado 80203

Carter Pilcher (202) 224-5941
Legislative Assistant
Office of Senator William Armstrong
528 Hart Senate Office Building
Washington, DC 20510

Mitch Stahl (303) 650-7886
Acting District Director
Office of Congressman Skaggs
1901 Harlan Street, Suite 130
Westminster, Colorado 80030

Sharon Triolo-Maloney (303) 866-1230
Legislative Aide
Office of Congresswoman Pat Schroeder
1600 Emerson Street
Denver, Colorado 80218

State Elected Officials

Tim Holeman (303) 866-2155
Policy Analyst
Office of the Governor
State Capitol
201 East Colfax
Denver, Colorado 80203

Al Meiklejohn (303) 893-8550
State Senator
1625 Broadway, Suite 1600
Denver, Colorado 80202

Jim Pierson (303) 866-2958
State Representative
6833 Welch Court
Arvada, Colorado 80004

Ted Strickland (303) 866-3342
State Senator
9361 Knox Court
Westminster, Colorado 80030

Local Officials

Sharon Bennetts (303) 273-3331 x9
City Manager
City of Golden
911 10th Street
Golden, Colorado 80401

Leslie Durgin (303) 441-3090
Mayor
City of Boulder
P.O. Box 791
Boulder, Colorado 80306

Jack Ethredge (303) 538-7217
City Manager
City of Thornton
9500 Civic Center Drive
Thornton, Colorado 80229

George Hovorka (303) 430-2400 x2001
Mayor
City of Westminster
4800 West 92nd Avenue
Westminster, Colorado 80030

Don Parsons (303) 450-8709
Mayor
City of Northglenn
11701 Community Center Drive
Northglenn, Colorado 80233

Robert Schulze (303) 466-2302
Mayor
City of Broomfield
#6 Garden Office Center
Broomfield, Colorado 80038

Dan Wilde (303) 237-6944
Mayor
City of Wheat Ridge
7500 West 29th Avenue
Wheat Ridge, Colorado 80033

Jim Zelenski (303) 987-7040
Acting Assistant City Manager
City of Lakewood
445 South Allison Parkway
Lakewood, Colorado 80226

Local Agencies

Bud Hart (303) 538-7422
Manager, Water Supply, Treatment and Quality
City of Thornton
9500 Civic Center Drive
Thornton, Colorado 80229

Ron Hellbusch (303) 430-2400 x2175
Director of Public Works
City of Westminster
4800 West 92nd Avenue
Westminster, Colorado 80030

Jean Jacobus (303) 277-8947
Policy Analyst
Jefferson County Attorney's Office
1700 Arapahoe Street
Golden, Colorado 80419

Tony Massaro (303) 640-2721
Director of Environmental Affairs
City of Denver
City/County Building, Room 350
Denver, Colorado 80202

Environmental and Interest Groups

Howard Brown (303) 232-1966
Executive Director
Rocky Flats Environmental Monitoring Council
1536 Cole Boulevard, Suite 150
Golden, Colorado 80401

Eugene DeMayo (303) 642-3117
Sierra Club
111684 Ranch Elsie Road
Golden, Colorado 80403

Paula Elofson-Gardine (303) 233-2465
Director
Concerned Health Technicians for a Cleaner Colorado
8470 West 52nd Place, #9
Arvada, Colorado 80002

John Fleissner (303) 825-3738
Citizens Against Nuclear Disinformation in Denver
P.O. Box 283
Broomfield, Colorado 80030

Kim Grice (303) 466-1212
Chairman
Committee Against Radiotoxic Pollution
10161 Wolff Street
Westminster, Colorado 80030

Susan Hurst (303) 238-5145
Networking Colorado
212 Balsam, #212
Lakewood, Colorado 80226

Melinda Kassen (303) 440-3381
Senior Attorney
Environmental Defense Fund
1405 Arapahoe
Boulder, Colorado 80302

Dr. William Kemper (303) 238-2148
Colorado Atomic/Agent Orange Veterans
7363 West 26th Place
Denver, Colorado 80215

Greg Marsh (303) 421-3383
Citizens Against Rocky Flats Contamination
7700 West 61st Avenue, Suite 12
Arvada, Colorado 80004

Leroy Moore (303) 444-6981
Rocky Mountain Peace Center
1520 Euclid Avenue
Boulder, Colorado 80306

Steve Perry (303) 443-3680
Colorado Freeze Voter
1520 Euclid Avenue
Boulder, Colorado 80302

Tom Rauch (303) 322-6353
American Friends Service Committee
1535 High Street, 3rd Floor
Denver, Colorado 80218

Jason Salzman (303) 440-3381
Greenpeace
2025 16th Street
Boulder, Colorado 80302

Cathy Schuster (303) 331-8326
Colorado Peace Council
8625 Clay Street, #226
Westminster, Colorado 80030

Glenna Smith (303) 422-1741
Communities Uniting for Environmental Safety
9763 Independence Avenue
Westminster, Colorado 80021

Joe Tempel (303) 298-8001
President
Rocky Flats Cleanup Commission
1738 Wynkoop, Suite 302
Denver, Colorado 80202

Medical/Public Health Representatives

Dr. Robert Bistline (303) 966-4309
Occupational Health
EG&G Rocky Flats, Inc.
P.O. Box 464
Golden, Colorado 80402-0464

Physicians for Social Responsibility (303) 298-8001
1738 Wynkoop, Suite 302
Denver, Colorado 80202

Businesses and Business Organizations

Sandy Bracken (303) 460-2259
Director, Public Affairs
Ball Aerospace Systems Group
P.O. Box 1235
Broomfield, Colorado 80020-8235

George Dibble (303) 831-7411
President and Chief Executive Officer
Colorado Association of Commerce and Industry
1776 Lincoln Street, Suite 1200
Denver, Colorado 80203

Dick Fleming (303) 894-8500
Executive Director
Greater Denver Chamber of Commerce
1600 Sherman Street
Denver, Colorado 80203

Alec Garbini (303) 279-6565
Director, Corporate Property Development
Adolph Coors Company
RR 856
Golden, Colorado 80401

Howard Lacy (303) 422-3545
President
Jefferson County Association
18300 West Highway 72
Golden, Colorado 80403

Jack Van Ens (303) 423-3800
Executive Director
Wheat Ridge Chamber of Commerce
4501 Wadsworth, Suite 107
Wheat Ridge, Colorado 80033

Roger Vernon (303) 423-9770
Chairman of the Board
Great Western Inorganics, Inc.
17400 Highway 72
Golden, Colorado 80403

Norm Waugh (303) 422-1915
Norm Waugh & Co./Metro Brokers, Inc.
12191 West 64th Avenue, Suite 210
Arvada, Colorado 80004

Educational Representatives

Heather Clifton (303) 466-1931
Principal
Sheridan Green Elementary School
10951 Harlan Street
Broomfield, Colorado 80020

Cary Israel (303) 466-8811
President
Front Range Community College
3645 West 112th Avenue
Westminster, Colorado 80030

Kay Pride (303) 273-6808
Senior Executive
Communications Services
Jefferson County Public Schools
1829 Denver West Drive, Building 27
Golden, Colorado 80401

News Media

Nan O'Neal (303) 455-5234
Sentinel Newspapers
5801 West 44th Avenue, Unit L-1
Denver, Colorado 80212

Rocky Mountain News (303) 892-5346
400 West Colfax Avenue
Denver, Colorado 80204

Area Residents

Charles McKay (303) 469-1873
10050 Wadsworth Boulevard
Westminster, Colorado 80021

Jan Pilcher (303) 756-6304
1381 South Birch Street
Englewood, Colorado 80110

Jean and John Woodis
9799 Alkire Street
Arvada, Colorado 80005

(303) 424-3948

APPENDIX B

ROCKY FLATS PLANT HAZARDOUS SUBSTANCES

Radionuclides

Plutonium 239,240
Americium 241
Uranium 233,234,235 and 238
Tritium
Gross Alpha
Gross Beta

Metals

Aluminum
Beryllium
Calcium
Cadmium
Cobalt
Chromium
Barium
Lead
Magnesium
Selenium
Sodium
Silver
Strontium
Thallium
Zinc
Mercury
Nickel
Lithium

Inorganics

Sulfuric Acid
Nitric Acid
Hydrofluoric Acid
Sodium Hydroxide
Hydrochloric Acid
Nitrate
Sulfate
Hydroxide

Volatile Organics

1,1,2-Trichloroethylene
Chloroform
1,1,1-Trichloroethane
Carbon Tetrachloride
1,2-Dichloroethane
Acetone
Perchloroethane
Benzene
Toluene
Methylethyl Ketone Peroxide
Dichloromethane
Xylene
2-Butanone
Methylene Chloride
Methyl Ethyl Ketone

Semi-Volatile Organics

Bis(2-ethylhexyl)phthalate
Ethylene Glycol

Miscellaneous

Diesel Fuel
Fuel Oil
Peroxide
Asbestos
Oil Sludge
Polyester Resin
Still Bottom Sands

APPENDIX C

COMMUNITY INTERVIEW RESPONSES

The Rocky Flats Plant solicited public assistance in the development of the *Rocky Flats Community Relations Plan* by conducting 67 interviews with federal, state and local officials; businesses; educational representatives; health professionals; interest groups; news media; and local residents. Tabulations of responses to key interview questions are detailed below. The tabulations reflect the number of times each answer was given directly or inferred. Some interview participants elected not to answer every question.

Main Community Concerns

Times Mentioned

Hazardous and Radioactive Materials Contamination	31
Fires, Accidents and Safety Issues	23
Health of Area Residents	19
Adequacy/Credibility of Information from the Plant	18
Health of Plant Workers	17
Negative Economic Effects of Plant Shutdown	8
Need for a Defense Facility	7
Resuspension of Contaminants During Cleanup	6
Lack of Balanced Information About the Plant	5
Inadequate Cleanup Funding	4
Effect on Property Values	4
Adequacy of Available Technology	3
Waste Transportation Issues	2
No Concerns	2
Operation of Aged Facility	1
Effects on Wildlife	1

Need for More Information About the Plant

Need More Information About the Plant	41
Do Not Need More Information About the Plant	21

Credible Sources of Information on Plant

Colorado Department of Health	19
U.S. Environmental Protection Agency	15
None*	13
U.S. Department of Energy	9
EG&G Rocky Flats, Inc.	9
Rocky Flats Environmental Monitoring Council	8
Area Municipalities	4
Rocky Flats Cleanup Commission	3

- * Some responders stated that, although no agencies or organizations are credible, some individuals within agencies and organizations are credible.

Difficulty in Obtaining Information About the Plant Times Mentioned

Difficult	25
Not Difficult	22
Have Not Tried	6
Sometimes Difficult	3

Reasons for Difficulty in Obtaining Information

Information Available Too Late	8
Plant Unresponsive	5
Information Transfer Slow	4
Information Too Technical	2
Requested Classified Information	1
Inconsistency in Plant Contacts	1

Preferred Methods of Information Dissemination

Newsletter/Update	45
Fact Sheets	32
Public Meetings	17
Computer Bulletin Board	17
Briefings	15
Mailing List	9
Newspaper Articles	8

Preferred Location for Public Meetings

Westminster	12
Rotate Locations	11
Golden	8
Arvada	7
Denver	6
Broomfield	5
Northwest Metropolitan Area	4
Boulder	4
Thornton	3
Northglenn	2

Preferred Time for Public Meetings**Times Mentioned**

Evenings	42
Both Daytime and Evenings	9
Daytime	8

Preferred Day for Public Meetings

Tuesday	31
Wednesday	31
Thursday	31
Monday	28
Friday	5
Saturday	3
Sunday	1

Convenient Locations for Information Repository

Existing Locations Adequate	27
Public or University Libraries	19
City Halls	4

Preferred Methods of Involvement in Cleanup

Review of Documents	14
Public Comment Periods	14
Workshops	14
Upfront Planning	13

Usefulness of Community Work Group to Review Workplans

Would Be Useful	42
Might Be Useful	11
Would Not Be Useful*	5

* Three of the five responders said that the Rocky Flats Cleanup Commission serves this function.

Scope of the Community Relations Plan

Should Address Issues in Addition to Environmental Restoration	45
Should Focus on Environmental Restoration Only	10

Issues That Should Be Included in Plan**Times Mentioned**

Waste Management	14
All Plant Activities	8
Environmental Monitoring	5
Production	1

Expectations Regarding Cleanup of Plant

Will Be Cleaned Up Enough for Some Uses	18
Will Be Cleaned Up (Degree Not Specified)	13
Will Require Much Time	12
Funding May Be Inadequate	11
Will Not Be Clean Enough for Any Use	4
Will Be Clean Enough for Any Use	1

APPENDIX D

HOURS AND LOCATIONS OF INFORMATION REPOSITORIES

U.S. Department of Energy Rocky Flats Public Reading Room
Front Range Community College Library
3645 West 112th Avenue
Westminster, Colorado 80030
(303)469-4435

Hours: 12:00 P.M. - 8:00 P.M. Monday and Tuesday
9:00 A.M. - 3:45 P.M. Wednesday, Thursday and Friday

* * * * *

U.S. Environmental Protection Agency
Region VIII
Superfund Records Center
999 18th Street, 5th Floor
Denver, Colorado 80202-2405
(303)293-1824

Hours: 7:30 A.M. - 4:30 P.M. Monday - Friday

* * * * *

Colorado Department of Health
4210 East 11th Avenue, Room 351
Denver, Colorado 80220
(303)331-4850

Hours: 8:30 A.M. - 5:00 P.M. Monday - Friday

* * * * *

Rocky Flats Environmental Monitoring Council
Building 4, Denver West Office Park
1536 Cole Boulevard, Suite 150
Golden, Colorado 80401
(303)232-1966

Hours: By Appointment

APPENDIX E
PUBLIC COMMENT OPPORTUNITIES

Document	Comment Period
OU 2 Proposed Surface Water Interim Measures/Interim Remedial Action Plan	September-November 1990
Community Relations Plan	January-March 1991
Plan for Prevention of Contaminant Dispersion	March-April 1991
Treatability Study-Environmental Assessment	June-July 1991
Workplan Designed to Implement Discharge Limits for Radionuclides	August-October 1991
OU 15 Closure Plan	December 1991-February 1992*
Treatability Study Report	October 1993-January 1994
Proposed OU 1 Final Remedial Action Plan/Environmental Assessment	January-March 1994
Proposed OU 2 Final Remedial Action Plan/Environmental Assessment	August-October 1994
Proposed OU 4 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	September-November 1994
Proposed OU 6 Remedial Action Plan/Environmental Assessment	January-March 1995
Proposed OU 7 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	April-June 1995
Proposed OU 5 Final Remedial Action Plan/Environmental Assessment	May-July 1995
Proposed OU 8 Final Remedial Action Plan/Environmental Assessment	July-September 1995
Proposed OU 12 Remedial Action Plan/Environmental Assessment	September-November 1995

Proposed OU 9 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	October-December 1995
Proposed OU 10 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	November 1995-January 1996
Proposed OU 13 Remedial Action Plan/Environmental Assessment	January-March 1996
Proposed OU 11 Environmental Assessment/Interim Measures/Interim Remedial Action Plan	March-May 1996
Proposed OU 14 Remedial Action Plan/Environmental Assessment	May-July 1996
Proposed OU 4 Remedial Action Plan	September-November 1997
Proposed OU 7 Remedial Action Plan/Environmental Assessment	February-April 1998
Proposed OU 9 Final Remedial Action Plan/Environmental Assessment	December 1998-January 1999
Proposed OU 11 Final Remedial Action Plan/Environmental Assessment	January-March 1999
Proposed OU 10 Final Remedial Action Plan/Environmental Assessment	April-June 1999

* The Colorado Department of Health is responsible for holding public comment periods on RCRA Closure Plans.

APPENDIX F

LIST OF ACRONYMS AND GLOSSARY

(LIST AND GLOSSARY BEING PREPARED)

APPENDIX G
REFERENCES

(LIST OF REFERENCES CITED IN PLAN BEING PREPARED)